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January 7, 2004

The Honorable Bruce Duke
Acting Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for January 2004 and preliminary February 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with January data, and previews the changes BellSouth is considering making for February data. A Data Disclosure Report for December 2003 would be filed at this time as well, if needed; however, for December 2003 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

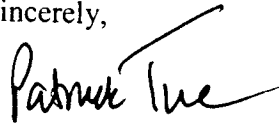
There are two additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its September 2003 Data Notification filed on September 23, 2003, BellSouth provided notice of a change to Measures O-7, O-8, O-9, and O-11 to mechanize these reports in PMAP (Item No. 1). This change was partially implemented with September 2003 data, but additional work necessary to mechanize these reports will be implemented with January 2004 data.

Second, in its October 2003 Data Notification filed on September 23, 2003, BellSouth provided notice of a change to Measure OSS-1 to mechanize this report in

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PMAP (Item No. 4). Although BellSouth expected to implement this change with October data, the change will be implemented with January 2004 data instead.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

PROPOSED JANUARY 2004 DATA NOTIFICATION

BellSouth proposes the changes described in this document to generate results for the January 2004 data month. Results for the January 2004 data month will be posted as follows:

Preliminary results February 21, 2004
Final results February 29, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O-7, O-8, O-9, O-11, O-13, O-14 & O-15

Description of Change: In addition to the current fields, BellSouth proposes to use the LSR Local Serving Office to more accurately identify the state to which the order should be assigned. This change will permit some records currently going to an error file due to an unidentified state code to be included in the data. This proposed change was Item (1) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4586)

Impact of Change: For August 2003, 1456 CLEC orders in the region, with an unidentified state code, could be correctly identified using the new criteria.

- (2) *Affected Measures:* O-7 & O-11

Description of Change: The numerator of Measure O-7 for manual LSRs incorrectly omits LSRs received in the data month but rejected in the following month. Also for manual LSRs, the denominator of measure O-11 erroneously includes FOCs/Rejects for LSRs received in the prior month in addition to LSRs received in the data month. BellSouth proposes to correct both of these problems. This proposed change was Item (2) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4601)

Impact of Change: For August 2003, 962 of 28,792 (3.34%) manually submitted LSRs should have been counted in the numerator for Measure O-7. For Measure O-11, 586 of

30,340 (1.93%) manually submitted LSRs should not have been counted in the denominator. This change will increase the performance of O-11 (non-mechanized) from 94.88% to 96.75%.

- (3) *Affected Measures:* O-7, O-8, O-9, O-11, O-13, O-14 & O-15

Description of Change: Currently, the PMAP code is not utilizing certain criteria that correctly identify an LNP LSR as Partially Mechanized. In these cases, the LSR is assigned as Fully Mechanized. BellSouth proposes to change the code to utilize these additional criteria. This proposed change was Item (3) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4623)

Impact of Change: For July 2003, 29 of 6,609 LNP orders were misclassified as Fully Mechanized.

- (4) *Affected Measures:* O-1, O-8 & O-9

Description of Change: Effective June 1, 2003, per Carrier Notification Letter SN91083672, the system maintenance window for the BellSouth EDI application was changed from Sundays 00:00 Midnight to 05:00 AM Central time to the following:

Saturdays 00:00 Midnight to 04:00 AM Central time; and
Sundays 00:00 Midnight to 07:00 AM Central time.

BellSouth proposes to update PMAP code to correctly account for the additional EDI OSS downtime as well as any future OSS availability changes in accordance with Carrier Notification Letters. This proposed change was Item (4) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4633)

Impact of Change: None.

- (5) *Affected Measures:* O-9

Description of Change: Currently, the manually produced FOC Timeliness Report for the Local Interconnection Trunk product is disaggregated by greater than and less than 10 circuits, which is not required by the SQM. BellSouth proposes to remove this disaggregation for this report and migrate the report into the standard PMAP mechanized report structure. (RQ4718)

Impact of Change: None.

Provisioning Measurements

- (6) *Affected Measures:* P-7C

Description of Change: Currently, BellSouth does not include non-coordinated conversions for the Provisioning Trouble in 7 Days Measure. BellSouth proposes to include these orders as required by the SQM. This proposed change was Item (5) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4128)

Impact of Change: For May 2003, there were 17 non-coordinated conversions that were not reported, none of which had troubles.

- (7) *Affected Measures:* P-1 (Florida and Tennessee only)

Description of Change: BellSouth currently does not include held orders, which were actually completed (and service was delivered) in the current month, but the completion was not posted in SOCS until the following month. This circumstance would occur when orders are completed near the end of the month and posting of the completion in SOCS is delayed into the following month. BellSouth proposes modifying the processing to include these held orders in the measure. This proposed change was Item (6) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4207).

Impact of Change: For June 2003, 3 additional records would be included in the wholesale results. Minimal change to reported result.

- (8) *Affected Measures:* P-8

Description of Change: For this measure, all orders completed in the data month should be reflected in the data. Currently, the original due date is used to determine the data month for SQM data and the date the data was extracted by PMAP is used to determine the data month for MSS data. BellSouth proposes to use the completion date to determine the month in which data is reported on all reports. This proposed change was Item (7) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4308)

Impact of Change: For June 2003, there were 495 total orders, one of which should have been included in the July data. Moving the orders to July data would result in a .2% change in the volume.

- (9) *Affected Measures:* All Provisioning Measures

Description of Change: BellSouth has discovered that Special Access services are erroneously being included in certain of the BellSouth Retail Analog data. BellSouth

proposes to remove these records, as they are not retail services. This proposed change was Item (8) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4522)

Impact of Change: Less than 1% volume impact in July 2003 data.

(10) *Affected Measures:* P-13D

Description of Change: The MARCH system is the source for the timestamp when a number is ported, which is necessary to calculate this measure. Currently, BellSouth augments mechanized searches in a MARCH file with manual searches in other MARCH files when a ported number is not found in the mechanized search. These additional MARCH files will now be brought into PMAP and the entire search process will be mechanized. Further, records where the ported number cannot be located in the MARCH files are currently counted as missing the standard even if that is not the case. BellSouth proposes to correct this problem by treating such records as invalid. This proposed change was Item (9) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4615)

Impact of Change: For September 2003, 61 records for the region would have been affected by this proposed change.

(11) *Affected Measures:* All Provisioning Measures

Description of Change: Service orders occasionally appear in the data with an issue date that is later than the due date, resulting in a negative interval. When this occurs, BellSouth proposes to use the earliest timestamp that appears in the SOCS history file as the issue date. If this date is later than the due date, which generally occurs when a new or change order was issued solely to correct records, BellSouth proposes to exclude the record. This proposed change was Item (10) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4540)

Impact of Change: For August 2003, 3725 of 4,482,341 (.08%) wholesale and retail orders had negative durations.

(12) *Affected Measures:* P-5

Description of Change: Currently, on the SQM Web reports for GA, KY, NC, LA, MS, SC, and AL, the interval distribution is reflecting 0.0% for all intervals although the measure result is correct. BellSouth proposes to correct data for these interval distributions. This proposed change was Item (11) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4665)

Impact of Change: None.

M&R Measurements

- (13) *Affected Measures:* All

Description of Change: BellSouth has discovered that Special Access services are erroneously being included in certain of the BellSouth Retail Analog data. BellSouth proposes to remove these records, as they are not retail services. This proposed change was Item (12) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4550)

Impact of Change: Less than 1% volume impact in July 2003 data.

Special Access Measurements

- (14) *Affected Measure:* SA-1, SA-2, & SA-6 (Georgia, Florida, and Tennessee)

Description of Change: Currently, when an ASR is received in EXACT without the date-received field populated, a receipt date of 01/01/1900 is automatically assigned, which causes an erroneous duration interval to be calculated. BellSouth proposes to add a filter on the date-received field to identify and treat as invalid ASRs that contain 01/01/1900 in the date-received field. This change was Item (13) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4467 & RQ4546)

Impact of Change: For July 2003, .04% of records would have been affected by this proposed change.

- (15) *Affected Measures:* SA-4, SA-5, SA-6, SA-7 & SA-8

Description of Change: Currently, BellSouth is using a snapshot of completed orders from SOCS taken on the third day of the month to calculate Special Access Measures. For these measures, all orders captured in the snapshot are used to calculate results instead of only those orders that are completed in the data month. BellSouth proposes to correct this problem. This proposed change was Item (14) on the Preliminary January Data Notification filed on November 3, 2003. (RQ4577)

Impact of Change: In August 2003, 1.28% of the records were reported in both July and August data.

PRELIMINARY FEBRUARY 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the February 2004 data month. Results for the February 2004 data month will be posted as follows:

Preliminary results February 20, 2004
Final results March 1, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 15.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported.

Impact of Change: None

- (2) *Affected Measures:* O-7, O-8, O-9 & O-11 (Florida and Tennessee only)

Description of Change: Currently, UNE combinations of loop, transport and multiplexer are counted as UNE Combo-Other. BellSouth proposes to report these products in the EEL disaggregations as opposed to UNE Combo-Other disaggregation. (RQ4388)

Impact of Change: For September 2003, on the Non-Mechanized FOC and Reject Completeness report, the results for UNE Combo would remain 100%. For EELs, the result would increase from 95.19% to 95.64%. Fully Mechanized and Partially mechanized LSRs were not impacted.

Provisioning Measurements

- (3) *Affected Measures:* P-1, P-2A, P-2B, P-3, P-4, P-5, P-6 & P-9

Description of Change: BellSouth currently uses the service representative's sales code to classify Local Interconnection Trunks between CLEC and retail data. If the sales code is incorrectly identified as a wholesale sales code, the retail circuit is incorrectly classified as a CLEC Local Interconnection Trunk. BellSouth proposes using the circuit ID and Company Identifier instead of the sales code to classify the orders more accurately. (RQ4083)

Impact of Change: For May 2003, a total of 742 records in the region with a Product ID of "Local Interconnect Trunks" were processed. Of these records, 108 were erroneously coded as wholesale instead of retail.

- (4) *Affected Measures:* P-1, P-2A, P-2B, P-3, P-4, P-5, P-6 & P-9 (Florida and Tennessee only)

Description of Change: Currently, UNE combinations of loop, transport and multiplexer are counted as UNE Combo-Other. BellSouth proposes to report these products in the EEL disaggregations as opposed to UNE Combo-Other disaggregation. (RQ4388)

Impact of Change: For September 2003, the OCI for EELs products would have changed by less than 0.3 days and PMIA would have changed by 0.25%

- (5) *Affected Measures:* P-3 (Florida and Tennessee only)

Description of Change: Currently, service orders that are cancelled after the due date are being reported in the data for months subsequent to the correct reporting month. Such orders are reported in each subsequent month until a two-month period elapses where the order has no activity, a condition that causes the order to be purged. BellSouth proposes to only include service orders cancelled after the due date in the data for the month in which the order is cancelled. (RQ4585)

Impact of Change: For August 2003, 0.6% of service orders in Florida and Tennessee were included in the data incorrectly.

- (6) *Affected Measures:* All Provisioning Measures

Description of Change: Certain field identifiers (FIDs) that correspond to ADSL products are not being classified as ADSL. BellSouth proposes to correct this problem. (RQ4624)

Impact of Change: For August 2003, 104 wholesale and retail records in the region would be considered ADSL products, which is an increase of .10% in the number of ADSL records.

M&R Measurements

- (7) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5 (Alabama, Georgia, Kentucky, Mississippi and South Carolina only)

Description of Change: BellSouth currently reports a separate disaggregation for the UNE Digital Loop, < DS1 and UNE Digital Loop, >=DS1 products that is not required by the SQM. BellSouth proposes to remove this product disaggregation. (RQ4427)

Impact: None.

- (8) *Affected Measures:* MR-2

Description of Change: Currently, BellSouth is over-counting lines for 2-wire analog loop non-design. Due to a change in the source system data, each end of the circuit is being counted as an individual line. BellSouth proposes to correct this problem. (RQ4664)

Impact of Change: CLEC CTRR for 2-wire analog loops non-design will approximately double.

- (9) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5

Description of Change: Currently, some CLEC records have either an invalid or null OCN code. BellSouth cannot therefore identify the proper company on the records. BellSouth proposes to use the ACNA code on the records to determine the correct company id where the OCN value is invalid or null. (RQ4674)

Impact of Change: Change to CTRR is less than half of one percent.

- (10) *Affected Measures:* MR-1, MR-2, MR-3, MR-4 & MR-5 (Florida)

Description of Change: Currently, the wire center lookup table has an embedded hyphen in JAY, FL and GAY, GA., which prevents BellSouth from identifying the wire center for trouble tickets and line counts in those cities. BellSouth proposes to insert a hyphen into codes on the data records to match the C LLI code for wire center determination. (RQ4709)

Impact of Change: Negligible impact on results. For September 2003, there would have been an increase of .002 % for CTRR.

Billing Measurements

(11) *Affected Measures:* B-9 & B-10

Description of Change: The err_msg_cd column will be removed from the raw data because it is not used to calculate the measurement results. (RQ3631)

Impact of Change: None.

515281

STATE OF SOUTH CAROLINA)
) CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Proposed January 2004 Data Notification Report and Preliminary February 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this January 7, 2004:

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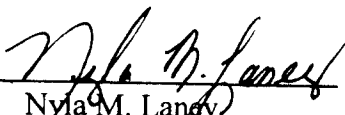
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